

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

LIBERTY LEGAL FOUNDATION;
JOHN DUMMETT;
LEONARD VOLODARSKY;
CREG MARONEY,

Plaintiffs

CASE NO: 2:12-cv-02143-cgc

v.

NATIONAL DEMOCRATIC PARTY
of the USA, Inc.;
DEMOCRATIC NATIONAL
COMMITTEE;
TENNESSEE DEMOCRATIC PARTY;
DEBBIE WASSERMAN SCHULTZ;
CHIP FORRESTER,

On Notice of Removal of Case
No. CH-11-1757-3 from Chancery
Court for the State of Tennessee in
Shelby County

Defendants

PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF MOTION
FOR EXTENSION OF TIME

Rule 6(b)(1) of the Federal Rules of Civil Procedure states "When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires."

Plaintiffs' have filed a motion to remand the instant case to Tennessee state court. Requiring Plaintiffs to respond to Defendants' multiple motions to dismiss

prior to this Court's ruling on Plaintiffs' motion to remand would be a waste of resources. For this reason the Plaintiffs respectfully request that this court extend Plaintiffs time to respond to the Defendants' several motions to dismiss. Should this Court deny Plaintiffs' motion to remand, Plaintiffs request 28 days following such order to prepare their response to the Defendants' pending motions to dismiss.

Respectfully submitted this 14th Day of March, 2012, by:

s/Van R. Irion
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CERTIFICATE REGARDING CONSULTATION

Pursuant to this Court's Local Rule 7.2(a)(1)(B), counsel for the Plaintiffs hereby certifies that upon consultation with opposing counsel, accord could not be reached regarding the instant motion. Said consultation was made with attorneys Ben Gastel and Gerard Stranch via e-mail on March 5 and 6, 2012.

s/Van R. Irion
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CERTIFICATE OF SERVICE

It is hereby certified that on March 14, 2012, a copy of “Plaintiffs’ Motion for Extension of Time” was filed electronically. A copy of this motion will be served upon the Defendants through the Court’s electronic filing system.

s/Van R. Irion
Van R. Irion